

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:)	Chapter 11
CONN'S INC., <i>et al.</i> ,)	Case No. 24-33357 (ARP)
Debtors. ¹)	(Jointly Administered)

**NOTICE OF APPEARANCE AND DEMAND FOR SERVICE OF PAPERS
AND REQUEST TO BE ADDED TO MASTER SERVICE LIST**

PLEASE TAKE NOTICE that the undersigned appear in the above-captioned chapter 11 cases (these “Cases”) on behalf of creditors, BCDC Portfolio Owner LLC, BCHQ Owner LLC, NNN REIT, L.P., NewMark Merrill Companies, and SITE Centers Corp. (each a “Landlord”, and collectively the “Landlords”). Pursuant to Rules 2002, 9007, and 9010(b) of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”) and section 1109(b) of Title 11 of the United States Code (the “Bankruptcy Code”), the Landlords request that the parties identified below be added to any Master Service List maintained in these Cases and that all notices given or required to be given and all pleadings, motions, applications, and papers served or required to be served in these Cases be delivered to and served upon the following parties:

Robert L. LeHane
Jennifer D. Raviele
Connie Y. Choe
KELLEY DRYE & WARREN LLP
3 World Trade Center
175 Greenwich Street
New York, NY 10007
Tel: (212) 808-7800

¹ The Debtors in these chapter 11 cases, together with the last four digits of each Debtor’s federal tax identification number, are: Conn’s Inc, (2840); Conn Appliances, Inc. (0706); CAI Holding, LLC (2675); Conn Lending, LLC (9857); Conn Credit I, LP (0545); Conn Credit Corporation, Inc. (9273); CAI Credit Insurance Agency, Inc. (5846); New RTO, LLC (6400); W.S. Badcock LLC (2010); W.S. Badcock Credit LLC (5990); and W.S. Badcock Credit I LLC (6422). The Debtors’ service address is 2445 Technology Forest Blvd., Suite 800, The Woodlands, TX 77381.

Fax: (212) 808-7897
Email: rlehane@kelleydrye.com
jrviele@kelleydrye.com
cchoe@kelleydrye.com
kdwbankruptcydepartment@kelleydrye.com

PLEASE TAKE FURTHER NOTICE that pursuant to section 1109(b) of the Bankruptcy Code, the foregoing demand includes not only the notices and papers referred to in the above-mentioned Bankruptcy Rules, but also includes, without limitation, all orders, applications, motions, petitions, pleadings, requests, complaints, or demands, whether formal or informal, written or oral, transmitted or conveyed by mail delivery, telephone, facsimile, or otherwise in these Cases.

PLEASE TAKE FURTHER NOTICE that filing of this *Notice of Appearance* shall not be deemed or construed to constitute a waiver of any substantive or procedural right of the Landlords including, without limitation: (i) the right to have final orders in non-core matters entered only after *de novo* review by the United States District Court for the Southern District of Texas (the “District Court”); (ii) the right to trial by jury in any proceeding related to these Cases or any case, controversy, or proceeding related to these Cases; (iii) the right to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal; (iv) the right to have any matter in which this Court, absent consent of the parties, cannot enter final orders or judgments consistent with Article III of the United States Constitution heard by the District Court; or (v) any other rights, claims, actions, defenses, setoffs, or recoupments to which the Landlords are or may be entitled, in law or in equity, all of which rights, claims, actions, defenses, setoffs, and recoupments are expressly reserved. Unless and until a Landlord expressly states otherwise, the Landlords do not consent to the entry of final orders or judgments by this Court if it is determined that this Court, absent consent of the parties, cannot enter final orders or judgments consistent with Article III of the United States Constitution.

Dated: August 13, 2024

KELLEY DRYE & WARREN LLP

/s/ Robert L. LeHane

Robert L. LeHane

Jennifer D. Raviele (*pro hac vice* pending)

Connie Y. Choe (*pro hac vice* pending)

3 World Trade Center

175 Greenwich Street

New York, NY 10007

Telephone: (212) 808-7800

Email: rlehane@kelleydrye.com

jraiviele@kelleydrye.com

cchoe@kelleydrye.com

*Counsel to BCDC Portfolio Owner LLC, BCHQ
Owner LLC, NNN REIT, L.P., NewMark Merrill
Companies, and SITE Centers Corp.*

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the August 13, 2024, a true and correct copy of the foregoing document was served via ECF notification on all parties entitled to ECF notification in this case.

/s/ Sherlly Alceus

Sherlly Alceus